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CATHERINE R. MCCABE
Acting Commissioner

Mr. Mark Austin
USEPA-Region 2
290 Broadway, Floor 20
New York NY 10007-1866

27April2018

Re: **NJDEP Comments—20Apr18 Final Draft Focused Feasibility Study Report-Operable Unit 8 (Impoundments 1 & 2 Remediation)**
Former American Cyanamid Site (Wyeth/Pfizer)
East Main Street, Bridgewater Township, Somerset County
NJDEP Preferred Identification Number: 001000

The New Jersey Department of Environmental Protection (NJDEP) had reviewed the 20Apr18 (received 25Apr18) Final Draft Focused Feasibility Study Report (FFSR)-Operable Unit (OU)-8 (Impoundments 1 & 2 Remediation), pursuant to the Amended & Restated Administrative Consent Order (ARACO) effective 23Dec15, the Site Remediation Reform Act (N.J.S.A.58:10C-1 et seq.), the Administrative Requirements for the Remediation of Contaminated Sites (N.J.A.C 7:26C), the Technical Requirements for Site Remediation at N.J.A.C. 7:26E, the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the National Contingency Plan (NCP), the Resource Conservation and Recovery Act (RCRA), the 18Mar13 Administrative Order on Consent & 8Dec15 Consent Decree between the United States Environmental Protection Agency (USEPA) and Wyeth Holding Corporation/Pfizer.

Please note that NJDEP sent its comments to USEPA on 9Jun17 and received responses from the responsible party on 20Apr18 (~10 months) which was after receiving the Proposed Plan. In the future, NJDEP would appreciate timely responses to its comments before moving on to the next phase. NJDEP comments on the referenced document are as follows:

1. **Response 2:** This response does not address NJDEP comment adequately. As NJDEP commented previously, use of Impoundment 8 Facility as Corrective Action Management Unit (CAMU) would require establishment of performance standards/criteria (treatment levels, leachability determination, strength, liner compatibility, etc.)

   Previous proposal from Wyeth/Pfizer included a proposed treatment level of Benzene at 24,000 mg/kg which corresponds to reduce relative risk at ~ 63%. The treatment level for benzene and relative risk factor (RRF) were calculated using the procedure included as part of 1997 Corrective Measure Study (CMS) for Group III Impoundments and 2007 Explanation of Significant Difference (ESD) for Impoundments 14 & 20. The proposed treatment level for Benzene (24,000 mg/kg) was based on a post-treatment benzene

concentration of 16,000 mg/kg after bench-scale treatability tests using steam-enhanced in-situ solidification & stabilization (ISS) following two hours of mixing. Since the post-treatment result of benzene was based on laboratory-scale testing, a 50% increase in the treated concentration was conservatively assumed **which resulted in the proposed treatment level for benzene at 24,000 mg/kg. This proposed treatment level for benzene is too high to be placed in the Impoundment 8 Facility.** If use of Impoundment 8 as CAMU is required then other treatment options should be considered which can achieve treatment levels for benzene and other contaminants of concern close to the CAMU requirement of 90% Capped by 10 x Universal Treatment Standards.

2. **Response 8:** The response acknowledges that NJDEP air pollution control standards are based on the 10^{-6} target cancer risk level and non-cancer hazard index of ≤ 1.0 but no changes to the FFSR are proposed. Why not?
3. **Response 19:** 1988 New Jersey Pollution Discharge Elimination System-Discharge to Groundwater (NJPDES-DGW) issued by NJDEP for Impoundment 8 Facility (incorporating requirements of RCRA Subtitle C) included requirements for maximum allowable leachate level through detection and monitoring. These requirements would be applicable or relevant and appropriate requirements (ARARs) if Impoundment 8 Facility is used as CAMU for consolidation of treated/stabilized waste/material.

Sincerely,

Haiyesh Shah

C: Mr. Allan Motter, NJDEP-BEERA
Mr. Marc Romanell, NJDEP/BGWPA